

Public Meeting Memorandum

To: Commissioners

Fr: Common Carrier Staff

Date: March 14, 2018

Re: Staff Bill Analysis for SB 205 (Draft D, dated March 3, 2018)

Overview:

Staff has been apprised that the Senate Labor and Commerce committee has requested the Commission's recommendation on SB 205. With this memorandum, Staff has endeavored to provide the Commission with information regarding the probable effect of the legislation on both the Commission's jurisdiction to provide meaningful regulation and oversight over intrastate telecommunications service and the Commission's day-to-day operations and budget. Staff is cognizant of the fact that support for the legislation enjoys the unanimous (or very nearly so), support of each of the major local exchange and interexchange carriers that provide intrastate telecommunications service in Alaska.

With that stated, Staff notes that it has already prepared an initial analysis of the bill that was provided alongside the fiscal note requested by the legislature, however it is Staff's understanding that the Department of Commerce, Community, and Economic Development, under whose umbrella the Commission sits, took steps to delete the analysis portion of the initial fiscal note. See Exhibit DHP-1. The content of the original fiscal note is, however, subsumed and augmented in this memorandum and, if the conclusions derived herein are shared by the Commission, Staff believes it would be appropriate to provide this document to the Legislature in aid of its decision on the merits of SB 205.

SB 205 – Section 1 – Municipal/Borough Ratemaking Jurisdiction

This section amends AS 29.35.070 (a) that authorizes a borough or city to assert ratemaking authority over an unregulated public utility that has not been deemed exempt under certain relevant provisions of AS 42.05.711. It appears to remove a reference to the Commission's authority to exempt certain carriers through regulations adopted under the Commission's jurisdiction over long distance competition. Staff believes this does not directly impact the Commission's authority and is likely included in the bill as a means of harmonizing later changes SB 205 makes to the Commission's jurisdiction over long distance service.

A note to the bill drafters – while the bill would add a section to preclude municipal regulation over an exempt long distance or local exchange carrier under AS 42.05.820, the failure to include the proposed AS 42.05.711(u) to AS 29.35.070(a) could be read as an opening for the assumption of borough regulation over a similarly exempt utility in that the changes to AS 42.05.820 do not, on their face, directly apply to borough government. Staff notes that the general tenor of SB 205 would not be consistent with a finding that this omission was intentional.

SB 205 – Section 2 – No LEC/IXC COLR; Ongoing Role in ETC Designation

This section would eliminate the Commission's ability to designate both local exchange (LEC) and interexchange (IXC) carriers of last resort. It would also enshrine the Commission's authority, granted to it by Congress in 47 USC 214(e), to designate eligible telecommunications carriers or ETCs, which are carriers eligible to receive federal universal service support. Staff reviews this section in terms of dollars of support as well as its impact on the Commission's jurisdiction.

ETC Designation

As the designating authority for Alaska's ETCs, the Commission has an active role in both (1) determining which carriers can access the tremendous federal support provided for telecommunications, especially in largely rural states like Alaska, and (2) in certifying to the FCC that the support received by each ETC in Alaska has been used appropriately. Staff has an annual role in reviewing the voluminous reports filed by ETCs that attempt to document how support has been historically used and the ETCs' plans for that support in the future. Unless the Commission, through Staff, certifies to the appropriate use of support by a particular ETC, an ETC does not receive that support going forward.

In terms of total federal support, Staff estimates that ETCs in Alaska are slated to receive in excess of \$2 billion in combined support through 2025. These monies that carriers have repeatedly argued at the federal level are essential for ongoing service to the many markets that otherwise would be unprofitable to serve. The FCC intends this oversight role of state public utility commissions to be rigorous, and a rigorous review requires Commission Staff. To the extent the remainder of SB 205 will make it difficult for the Commission adequately staff and pay for a Common Carrier section, the Legislature should be made fully aware that the possible impact on the Commission's role managing the floodgates of that \$2 billion federal subsidy stream.

IXC/LEC COLR Elimination

Transitioning to the elimination of IXC and LEC COLR designations and associated obligations, which SB 205 would preclude the Commission from designating, Staff cites the following statistic: \$47,065,071.97. This is the total LEC COLR support issued by the Alaska Universal Service Fund (AUSF) to the designated LEC COLRs that serve in competitive markets since 2011. A full accounting of COLR support by carrier and by year is provided as Exhibit DHP-2.

These local exchange carriers designated as LEC COLRs in competitive markets have been compensated to date for the loss of lines due to competition and attrition so as to provide the buttress to ongoing service to all customers that COLR designation was intended to provide in developing competitive markets and their underlying networks. The local exchange carriers were very convincing in R-08-003 that certain markets outside of Anchorage were not thoroughly competitive, and that a market shock would leave the designated COLR unable to exit while its erstwhile competitor would not be similarly committed.

In relation to SB 205, it has been argued that carriers throughout Alaska are currently subjected to substantial competition. This is the prime basis for the reforms SB 205 would effectuate; however, actual efforts to eliminate LEC COLRs by the Commission in markets deemed to be competitively mature, and thus on substantially the same competitive footing as Anchorage, have, to date, been met with vociferous claims that competition was in fact lacking. Staff notes that these disputes involve areas

that Staff believes most Alaskans would agree are some of the most developed parts of the state – the Mat-Su Valley, Juneau, and Fairbanks. In fact the Commission is currently embroiled in a lawsuit seeking to overturn those pinpoint LEC COLR terminations even as the Industry is speaking with a unified voice to the Legislature that competition in Alaska is nearly ubiquitous, and that COLR protections in even the most remote parts of Alaska are perfunctory. It may be prudent for legislators to ask Industry what exactly the State and its citizenry has actually received in exchange for the \$47 million in historic COLR support provided to competitive LEC COLRs if not an ongoing commitment to serve as designated until that support was terminated by a reasoned Commission decision.

As for IXC COLRs, Staff notes that there is no similar support mechanism in place to compensate IXC's that serve the many remote areas of Alaska. Staff acknowledges that there are many areas of the state where AT&T serves as the only IXC, and that doing so is often not a profitable enterprise. Staff points out recent reforms that installed regulations whereby an IXC COLR is permitted to transfer its designation to a particular exchange to another IXC under certain conditions. AT&T recently transferred its IXC COLR designation to GCI in the Terra SW areas because of the superior market share and facilities GCI possesses there. However, where there is no other IXC to shoulder that load, AT&T, as the incumbent, has, in Staff's view, been appropriately burdened with the obligation to continue to provide service.

And while it is true that the COLR concept has falling away in the vast majority of states as an antiquated, Staff notes that very few other states present such a uniquely nascent competitive marketplace, a fact which Industry is not generally shy about reminding the FCC. Staff is therefore of the opinion that both LEC and IXC COLR protections are still sound policy, and that the decision to designate or relieve a particular carrier from the attendant obligations is best made on a case-by-case basis by a well-informed Commission.

SB 205 – Section 3 – Broad Telecommunications Exemption from Regulation

This section would amend AS 42.05.711 to add a new subsection (u), which would exempt any telecommunications carrier from economic regulation and tariffing obligations. This has been described by industry as the “Cooperative Model”, in that it would treat for-profit telecommunications carriers as cooperatives, which have, through an affirmative vote of their members, the right to exempt the cooperative from economic regulation by the Commission pursuant to AS 42.05.712. Most, but not all, telecommunications cooperatives in the state have passed a deregulation ballot, most recently MTA.

Staff notes that recent reforms in R-14-001 have, in competitive markets, relieved those carriers from nearly every form of active Commission regulation beyond tariffing. Tariff changes for those carriers take effect the same day they are filed with Commission and are reviewed only for procedural compliance with rules regarding public noticing, revision accuracy, and other safeguards intended to inform consumers about the changes being made to the tariff and to protect against discrimination by ensuring similarly situated customers are treated fairly and equally. The tariff plays an important role in consumer protection in that it defines the terms and conditions of service. The tariffing obligations for competitive carriers are intended to aid the Commission’s consumer protection function – which is one of the functions that Industry intends the Commission to carry on doing. Staff is perplexed by how the Commission can do this effectively without access to a current and historic tariff.

The only other active rate regulation that Staff can think of is the obligation to provide cost justification for line extension rates for carriers that despite retail market share, still retain effective market control over the essential network facilities needed to supply service to a particular exchange. Carriers with that kind of control over the market for facilities extension could otherwise subject new customers and developers to unreasonably high line extension rates. Staff notes that it is a testament to the degree to which the underlying network facilities are not competitive that only ACS of Anchorage has been relieved of this obligation.

Aside from competitive markets, Staff believes that SB 205 would likely be the most aggressive of all the 41 or so state deregulation actions cited by Industry in that it would eliminate economic oversight for many monopoly carriers, which to Staff violates the fundamental basis for the Commission's jurisdiction over all public utilities. Staff is not aware of any state that has similarly eliminated economic oversight over monopoly carriers – if Industry has a citation, Staff would be happy to review it. It is axiomatic to regulatory theory that where there is an essential service that most people need or want, and where the provision of that service is most efficiently provided by a single entity, that the monopoly which results is only exempted from federal and state anti-trust legislation because the state regulator steps in to provide the artificial competitive pressures necessary to approximate competitive rates. Proxy competition establishes the actual cost to provide the service, and sets a reasonable rate of return for the carrier on top of that. SB 205 would eliminate the protections of economic regulation to that portion of Alaska that has only one wireline provider.

Focusing on the cooperative model espoused by Industry, Staff notes that it is true that cooperatives are permitted to vote away RCA ratemaking authority. A municipality-run utility is similarly permitted under certain circumstances to avoid RCA economic regulation. The working theory behind these exemptions is the fact that customers serviced by cooperatives or municipally run utilities have the structural safeguard provided by the ballot box. A municipal customer can turn utility service and rates into an election issue. A cooperative customer can vote out the board that authorizes a rate increase that is considered to be unjustified. Staff would ask legislators to consider what recourse, if any, a customer of a monopoly for-profit carrier has when its carrier raises its rates? SB 205 would eliminate this fundamental structural safeguard for many rural customers. In Staff's review of the testimony offered to the Senate subcommittee to date, this fact has not even been mentioned.

Staff notes that the following local exchange carriers are for-profit monopolies that operate in state: United Utilities, United-KUC, Yukon Telephone, Adak, Alaska Telephone Co., Bristol Bay Telephone Co., Bettles Telephone, Bush-Tell, Circle Telephone, ACS of the Northland (Bush Study Area), Interior Telephone (minus Seward and Moose Pass), Mukluk Telephone (minus Nome), North Country Telephone, and Summit Telephone. While each of these carriers is free to lower any rate, they are currently only permitted to raise rates for intrastate telecommunications services through a rate case filed with appropriate cost support.

Currently the Commission has regulations that allow for a carrier or other interested party to petition the Commission to designate a study area or portion thereof as competitive. The Commission is permitted to consider the role of intermodal competition in making that decision and it may be argued that many areas that are considered monopoly markets for local exchange service are in fact served by wireless carriers. This is often a wireless carrier affiliated with the local exchange carrier, but not always. A carrier that wishes out of economic regulation on the theory that wireless services provide

sufficient competitive pressure is free to petition for that relief today. But as the recent testimony from frustrated customers on Prince of Wales Island makes clear, competitive wireless coverage can be spotty, and the incentives even for designated eligible telecommunications carriers to extend wireless service in many areas has been slow to materialize. It is therefore an open question whether each exchange served by a monopoly wireline carrier is actually subjected to the necessary market discipline from non-traditional telecommunications services to responsibly relax economic regulation in the manner contemplated by SB 205. This has always been a case-by-case determination based on demonstrated market conditions, and the tools required to take measured steps toward deregulation in competitive markets is already in place and has been used, in surgical fashion, many times. In Staff's view, SB 205 would remove the scalpel from the Commission to determine what exchanges to carve out from economic regulations and would instead abandon certain customers to the whims of for-profit monopolies.

Staff notes that recent history finds few rate cases filed by even the most remote monopoly carriers. It may be argued persuasively that the near-term practical effect on customers from removing the Commission's economic regulation over for-profit monopoly carriers that provide them with telecommunications service is therefore very small, possibly non-existent. Staff, however, suggests that this is only a product of the fact that the FCC and the state have, to date, provided a litany of support mechanisms that have relieved carriers from the burden of seeking rate increases from customers in order to keep pace with the true cost of providing service in remote areas of Alaska that are otherwise considered very expensive and difficult to serve. In fact, in response to current rulemaking proposals to eliminate and possibly reconstitute the Alaska Universal Service Fund administered by the Commission, GCI provided estimates of the increase to local rates of its ILEC subsidiaries that would be occasioned by the elimination of CCL revenues currently supplied by the AUSF. UUI would require an increase of 145%, United KUC would require an increase of 68%, and Yukon Telephone would require an increase of 97%. Mind, this is only in response to the potential loss of state funds, which are minuscule in comparison to the federal support flowing to for-profit monopoly carriers. Staff notes that the current federal high cost funding for Alaska ETCs is slated to end in 2025. In the wake of SB 205, what protections will customers have if the support safety net insulating carriers from seeking rate cases is removed? This is another contingency that legislators should be encouraged to consider.

SB 205 – Section 4 & 5

Section 4 amends the prohibition on municipal rate regulation for exempt telecommunications carriers. As noted above, there appears to be a gap opened by the omission of a reference to the proposed AS 42.05.711(u) from the amendment to AS 29.35.070(a), which would ostensibly allow a borough to assert ratemaking authority in areas served outside a "city". As discussed Staff believes this was an unintentional omission.

Section 5 appears to be housekeeping in nature and is not further analyzed.

SB 205 – Section 6

Section 6 repeals the following statutes:

AS 42.05.145

As noted, in preparation for participating in this discussion, Staff reviewed the transcripts of the hearings held to date on SB 205. One of the points most in need of clarification, beyond the fact that SB 205 will have a large potential impact on consumers receiving service from monopoly for-profit carriers, is the characterization of the repeal of AS 42.05.145 as merely a statute that involves the deregulation of telephone directories. Far from that, AS 42.05.145(a) establishes that “A utility that provides local exchange or interexchange telecommunications service in the state affects the public interest. Regulation of these utilities shall, consistent with this chapter, seek to maintain and further the efficiency, availability, and affordability of universal basic telecommunications service.”

Essentially, AS 42.05.145(a) propounds the Legislature’s public interest finding for telecommunications service. Staff can only guess at the probable effect repealing this will have, but questions whether a carrier, no longer bound by COLR obligations after SB 205, and seeking to be relieved of obligations to provide service under its certificate, will be able to point to the legislature’s repeal of its public interest finding that presumes service is inculcated with the public interest and demand to be let out of its certificate obligations. Staff notes that at the same time Industry is defending the elimination of COLR designations by arguing that the procedures for discontinuance of service pursuant to AS 42.05.261 will remain an adequate safeguard for customers, it is also advocating repealing the public interest finding in AS 42.05.145(a). Again, legislators should be cautioned and encouraged to explore the full weight of changes SB 205 would have to general consumer protections that have always been taken as given in Alaska.

AS 42.05.325

This statute deals with regulation of alternate operator services, and Staff is not aware of any substantive impact its repeal would occasion on the Commission.

AS 42.05.800, 810

These statutes govern long distance competition policy, and include several findings made by the Legislature regarding the importance of long distance competition. Staff notes that competitive entry in the IXC market is a settled concept, though Staff does highlight the fact that facilities-based IXC competition is not present everywhere throughout the state. Staff also notes that the Commission’s authority to determine which areas of Alaska do not merit long distance service under AS 42.05.810(c), the repeal of which could ostensibly play an outsized role in any application to discontinue IXC service in a particular location. If the Commission’s overt authority to make public interest findings regarding the need for IXC service in a particular location is repealed, this overt act of repealing this authority may be used in support of a discontinuance petition. Staff notes that IXCs have sought in the past to eliminate IXC service on grounds that too few customers were taking service – the Commission and legislators should consider whether this repeal would impact that analysis if SB 205 becomes law.

SB 205 – Section 7 – RCC Elimination Transition

This provision would provide a transition period between the effective date of the changes in SB 205, which would exempt from economic regulation, and the elimination of the concomitant obligation to

pay regulatory cost charges (RCCs) pursuant to AS 42.05.254. After July 1, 2019, individual LEC and IXC carriers would only be obligated to pay the actual cost of regulation.

At the outset, Staff wanted to clear up a potential error in the marketing of SB 205, namely that it eliminates the regulatory cost charge on consumer bills and shifts actual costs to providers. Staff notes that AS 42.05.254 requires public utilities, not public utility customers, to pay RCCs. The statute permits, but does not require, a public utility to recover the RCC's paid to the Commission through its rates. Similarly, by regulation, the Commission allows, but does not require, a public utility to have a direct pass-through customer charge line item on customer's bills. So it is completely within any carrier's own prerogative whether it requires customers to directly cover the costs of utilities regulation. Should the legislature deem it appropriate to substitute actual cost assessments for hard coded RCCs, which Staff notes were instituted to avoid debate, litigation and apportionment of costs in, for instance, joint regulations dockets, Staff is not assured that customers would reap any tangible financial benefit because the carriers would be completely unhampered in rolling the actual costs assessed into rates given that even for-profit monopoly carriers would be free to raise rates without oversight.

Staff does agree with Industry in so far as they have noted that the class of economically deregulated telecommunications carriers currently exempted from paying RCCs have, to date, been given a free ride by participating and benefitting from general rulemakings conducted by the Commission without the attendant obligation to bear their fair share of costs. Staff highlights the Commission's ongoing efforts to establish procedures to begin assessing costs in keeping with AS 42.05.254. However, in Staff's view the proposal to exempt two entire industries – IXCs and LECs – from having any formal obligation to pay upfront for the costs borne by the Commission in the various roles that will be maintained will likely create further unfairness and increased complexity in how the Commission is funded.

Despite SB 205, the Commission will still be required to review Applications for New Service, Controlling Interest Applications, Name Change Applications, Discontinuance Applications, IXC Registrations and AUSF Surcharge and Access Charge Filings. The Commission will also still participate in AUSF oversight and possible audits, review the AUSF board appointments and possibly vet the replacement of the AUSF servicing company. The Commission will still conduct rulemaking dockets covering each and every one of these roles to the extent changes to the rules required, including efforts to overhaul the current AUSF.

Further, the Commission will have an ongoing role as the state liaison for the FCC, and will be required to review relevant federal and state filings related to the provision of telecommunications services by ETCs that it designates, most importantly certifying to the appropriate use of federal support by those ETCs, which is a prerequisite for continued receipt of such federal support. The Commission will still conduct rulemaking dockets concerning these ongoing regulatory roles, and must be prepared to revise state regulations to comport with changes in federal law and regulations, as well as comment on behalf of Alaska interests in federal rulemaking dockets. It is not clear whether SB 205 would eliminate oversight of inmate calling services or not, but if not, the Commission has a continuing role to play in helping the Department of Corrections in selecting a competent service provider and ensuring tariff provisions for those services are fair and reasonable. The Commission will also continue to maintain and support its Telecommunications Relay Service, and associated support fund, that supplies services to persons with disabilities impacting telecommunications.

Finally, the Commission will still, by law, be required to maintain a Common Carrier section – the Legislature deemed it appropriate to require this, and with good reason considering each of the functions the Common Carrier section is required to do. Currently, the Common Carrier section is at its lowest employment since its inception, meaning that the proportion of Commission costs flowing to telecommunications end users is likely at a low point. But it isn't just Common Carrier staff that will be effected by SB 205. Support staff routinely work on telecommunications matters and will continue to do regardless of SB 205. Records and Filing staff will still intake, catalogue and provide customer service for carriers making filings with the Commission. Law office assistants will maintain confidentiality for sensitive filings and process public notices and mailings for ongoing telecommunications matters, while paralegals and administrative law judges will still work on processing orders in adjudicatory and rulemaking dockets concerning matters that remain under the Commission's purview. And customers of telecommunications carriers will still be able to request the Commission's Consumer Protection section help mediating disputes, a function that Industry touts among the remaining consumer protections that would persist after SB 205.

How will all of this work get paid for when the full cost of the Commission regulatory role in Telecommunications is not paid for in advance? How will a system of actual costs blend with the regulatory cost charge system that will continue for other industries that remain economically regulated? Will other industries be obligated to cover the actual costs of support staff working on telecommunications matters until the proceeding establishing those costs with finality is closed? Certain rulemakings take a full two years and presumably cost assessments will be open to challenge – will actual cost assessments be subject to appeal, and how does all that delay accord with the general "cost causer cost payer" principle that underpins utility regulation? Will the Commission be forced to hire additional staff just to coordinate payments and reimbursements between industry sectors? Will the Commission be forced to seek general funds to cover telecommunications matters until they are paid? Who will cover the cost of community input hearings and the processing of public comments in both adjudicatory and rulemaking – will the right of the public to participate in the continued regulation of telecommunications be determined by whether that individual or group has the wherewithal to pay for the right to participate, and if not, what entity bears that cost?

These are very vexing questions for which Staff does not have a good answer, and to date, has not heard adequate reassurances from those supporting SB 205. Staff believes the breadth of duties that will remain assigned to the Commission after SB 205 **likely justifies the continued payment by all carriers that benefit**, including cooperatives and municipally owned carriers that have avoided paying their share since the inception of the RCC model. It is Staff's hope that perhaps that worthwhile change will be explored by the Legislature as the silver lining to this current exercise.

FISCAL NOTE ANALYSIS

STATE OF ALASKA
2018 LEGISLATIVE SESSION

BILL NO. SB 205

Analysis

SB 205 will eliminate most Regulatory Commission of Alaska (RCA) functions pertaining to telecommunications service, including its ability to assess whether or not a discrete telecommunications market is competitive and set local rates for telecommunication services in non-competitive markets.

The RCA would still be required to certificate wireline telecommunications carriers and adjudicate the relinquishment or transfer of those certificates. It is not clear whether the bill would impact the RCA's oversight of inmate calling services or telecommunication relay services provided to consumers with disabilities.

The RCA would also continue to act as state liaison with the Federal Communications Commission (FCC), the federal body with regulatory responsibility for telecommunications and information services. The RCA will still be required to review relevant federal filings related to the provision of telecommunications services within the state by Eligible Telecommunications Carriers (ETCs) that it has previously designated or may designate in the future. The RCA will also be required to provide annual certifications to the FCC that each designated ETC is using federal universal service funding for intended purposes. Additionally, the RCA may be required to address service problems related to state and federal Lifeline (a subsidy program providing telecommunications services for low-income consumers) and address 911 (emergency service) issues that may arise.

SB 205 does not repeal AS 42.05.840, the statute allowing the RCA to establish a universal service fund to be used to ensure the provision of long distance service at reasonable rates throughout Alaska and to otherwise preserve universal service. The RCA will continue to have oversight responsibility for the Alaska Universal Service Fund (the RCA currently has a docket open to consider modifications to the Alaska Universal Service Fund).

Among the retained statutes governing telecommunications service is AS 42.04.100, requiring the RCA to establish a Communications Carrier Section to develop, administer, and recommend policies and programs related to communications in the state involving wire, cable, radio, and space satellites.

The RCA expects to implement the provisions of this legislation with existing resources. The Regulatory Cost Charge (RCC) adopted by the RCA through regulation funds the agency's annual operating budget. SB 205 eliminates the application of the RCC to telecommunication services that currently generate 20 percent of RCC revenue. Consequently, the RCC may be raised for other regulated utility sectors (e.g., electric, natural gas, water/wastewater, pipeline, refuse.)

Alaska Universal Service Administrative Company
 Annual Summary of COLR Distributions (2011 - 2017)

Cash Distributions	Total	2011 COLR Support	2012 COLR Support	2013 COLR Support	2014 COLR Support	2015 COLR Support	2016 COLR Support	2017 COLR Support
ACS of Alaska - Ft. Wainwright	\$1,086,948.40	\$64,377.90	\$159,919.06	\$168,495.44	\$172,461.00	\$178,592.00	\$184,638.00	\$158,465.00
ACS of Alaska - Juneau	\$4,021,380.96	\$262,721.65	\$653,890.31	\$677,627.00	\$651,631.00	\$620,608.00	\$616,793.00	\$538,110.00
ACS Anchorage								
ACS Fairbanks	\$11,209,151.40	\$578,030.40	\$1,469,277.56	\$1,618,548.44	\$1,702,110.00	\$1,794,904.00	\$1,944,058.00	\$2,102,223.00
ACS of the Northland - Glacier State	\$10,288,811.27	\$252,654.15	\$839,115.81	\$1,282,352.31	\$1,551,956.00	\$1,795,520.00	\$2,113,195.00	\$2,454,018.00
ACS of the Northland - Sitka	\$1,016,058.98	\$17,645.85	\$89,339.19	\$164,136.94	\$179,683.00	\$176,132.00	\$179,148.00	\$209,974.00
Adak								
AECA CCL Admin Fee								
Alaska Telephone Company								
Arctic Slope Telephone Association Cooperative	\$1,281,125.00	\$26,392.50	\$102,264.50	\$167,211.00	\$191,373.00	\$217,353.00	\$261,766.00	\$314,765.00
Bristol Bay Telephone Cooperative								
Bettles Telephone Company								
Bush-Tell								
Circle Telephone Company								
Cordova Telephone Cooperative	\$393,771.00	\$722.50	\$23,631.50	\$51,628.00	\$53,479.00	\$69,694.00	\$89,418.00	\$105,198.00
Copper Valley Telephone Cooperative	\$2,399,616.00	\$43,521.25	\$150,934.75	\$267,722.00	\$374,636.00	\$470,659.00	\$545,167.00	\$546,976.00
Interior Telephone Company	\$2,258,177.00	\$52,294.60	\$174,367.44	\$278,912.40	\$355,353.56	\$410,321.00	\$463,740.00	\$523,188.00
Ketchikan Public Utilities	\$1,633,768.96	\$45,997.90	\$138,967.06	\$205,988.00	\$257,201.00	\$288,630.00	\$325,566.00	\$371,419.00
Matanuska Telephone Association	\$10,728,679.96	\$180,179.15	\$681,935.81	\$1,200,929.00	\$1,602,643.00	\$1,991,495.00	\$2,456,459.00	\$2,615,039.00
Mukluk Telephone Company	\$747,583.04	\$19,692.10	\$60,023.94	\$85,503.25	\$109,252.75	\$135,459.00	\$157,669.00	\$179,983.00
North Country Telephone Company								
Nushagak Electric & Telephone Cooperative								
OTZ Telecommunications								
OTZ Telephone Cooperative								
Summit Telephone Company								
United KUC								
United Utilities								
Yukon Telephone Company								
Total	\$47,065,071.97	\$1,544,229.95	\$4,543,666.93	\$6,169,053.78	\$7,201,779.31	\$8,149,367.00	\$9,337,617.00	\$10,119,358.00